

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO**

**THE UNITED STATE OF AMERICA,**

**Plaintiff,**

**vs.**

**CASE NO. 05 CR 1849 JH**

**RUSSELL TRUJILLO**

**Defendant.**

**DEFENDANT RUSSELL TRUJILLO'S UNOPPOSED MOTION  
TO MODIFY CONDITIONS OF RELEASE**

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Defendant Russell Trujillo through counsel Penni Adrian respectfully moves this Court to enter its Order Modifying his Conditions of Release by deleting the requirement for electronic monitoring. As grounds therefor he states:

1. Mr. Trujillo has been on electronic monitoring since his release from custody on August 29, 2005.
2. He has been compliant with his conditions of release in every respect.
3. Pre-Trial supervisor Andrew Romero recommends that Mr. Trujillo be removed from electronic monitoring.
4. Assistant United States Attorney James Braun does not oppose this Motion.

WHEREFORE defendant respectfully moves this Court to enter its Order Modifying his Conditions of Release by deleting the requirement of electronic monitoring.

Respectfully submitted,

**Electronically Filed**  
Penni Adrian  
Counsel for Russell Trujillo  
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I hereby certify a true copy of the foregoing  
Defendant Russell Trujillo's Unopposed Motion  
to Modify Conditions of Release was mailed to  
the following persons entitled to service this  
3<sup>rd</sup> day of October, 2005:

James Braun  
*Assistant United States Attorney*  
P.O. Box 607  
Albuquerque, NM 87103-0607

Andrew Romero  
*Probation/Pre-Trial Officer*  
United States District Court  
333 Lomas Blvd. NW  
Albuquerque, NM 87102

**Electronically Filed**  
Penni Adrian